

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

EMOJI COMPANY GmbH,

Plaintiff,

v.

SHIHAO31 et al.,

Defendants.

Case No.: 20-cv-5636

Judge Charles P. Kocoras

**PRELIMINARY INJUNCTION ORDER**

THIS CAUSE being before the Court on EMOJI COMPANY GmbH's Motion for a Preliminary Injunction, and this Court having considered the evidence before it hereby GRANTS Plaintiff's Motion for Entry of a Preliminary Injunction in its entirety against the Defendants identified in Schedule A attached hereto (collectively, the "Defendants").

THIS COURT HEREBY FINDS that it has personal jurisdiction over the Defendants since the Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, Defendants are reaching out to do business with Illinois residents by operating one or more commercial, interactive Internet Stores through which Illinois residents can purchase products bearing infringing and/or counterfeit versions of Plaintiff's EMOJI Trademarks (the "EMOJI Products").

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order ("TRO") should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of Plaintiff's

previously granted Motion for a Temporary Restraining Order establishes that Plaintiff has a likelihood of success on the merits; that no remedy at law exists; and that Plaintiff will suffer irreparable harm if the injunction is not granted.

Specifically, Plaintiff has made a *prima facie* showing of trademark infringement because (1) the EMOJI Trademarks are distinctive marks and registered with the U.S. Patent and Trademark Office on the Principal Register as U.S. Trademark Registration Nos. 4,868,832; 5,202,078 and 5,415,510 for the EMOJI marks, (2) Defendants are not licensed or authorized to use EMOJI Trademarks, and (3) Defendants' use of the EMOJI Trademarks are causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with EMOJI COMPANY GmbH. Furthermore, Defendants' continued and unauthorized use of the EMOJI Trademarks irreparably harms Plaintiff through diminished goodwill and brand confidence, damage to Plaintiff's reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, Plaintiff has an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendants' actions.

Accordingly, this Court orders that:

1. Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be preliminarily enjoined and restrained from:
  - a. using Plaintiff's EMOJI Trademarks or any confusingly similar reproductions, counterfeit copies or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any

product that is not a genuine EMOJI Product or is not authorized by Plaintiff to be sold in connection with Plaintiff's EMOJI Trademarks;

- b. passing off, inducing, or enabling others to sell or pass off any product as a genuine EMOJI Product or other product produced by Plaintiff, that is not Plaintiff's or is not produced under the authorization, control or supervision of Plaintiff and approved by Plaintiff for sale under Plaintiff's EMOJI Trademarks;
- c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff;
- d. further infringing Plaintiff's EMOJI Trademarks and damaging Plaintiff's goodwill;
- e. otherwise competing unfairly with Plaintiff in any manner;
- f. shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which bear Plaintiff's EMOJI Trademarks or any confusingly similar reproductions, counterfeit copies or colorable imitations thereof;
- g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Online Marketplace Accounts, the Defendant Domain Names, or

any other domain name or online marketplace account that is being used to sell (now or in the future) Counterfeit EMOJI Products; and

- h. operating and/or hosting websites at the Defendant Domain Names and any other domain names registered or operated by Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product bearing Plaintiff's EMOJI Trademarks or any confusingly similar reproductions, counterfeit copies or colorable imitations thereof that is not a genuine EMOJI Product or is not authorized by Plaintiff to be sold in connection with Plaintiff's EMOJI Trademarks.
2. Each Defendant, within fourteen (14) days after receiving notice of this Order, shall serve upon Plaintiff a written report under oath providing: (a) their true name and physical address, (b) all websites and online marketplace accounts on any platform that it owns and/or operate (c) their financial accounts, including all DHgate accounts, and (d) the steps taken by that Defendant to comply with paragraph 1, a through h, above.
3. The domain name registries for the Defendant Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afiliast Limited, CentralNic, Nominet, and the Public Interest Registry, within three (3) business days of receipt of this Order or prior to expiration of this Order, whichever date shall occur first, shall, at Plaintiff's choosing:
  - a. unlock and change the registrar of record for the Defendant Domain Names to a registrar of Plaintiff's selection until further ordered by this Court, and the domain name registrars shall take any steps necessary to transfer the Defendant Domain Names to a registrar of Plaintiff's selection until further ordered by this Court; or

- b. disable the Defendant Domain Names and make them inactive and untransferable until further ordered by this Court.
- 4. Those in privity with Defendants and with actual notice of this Order, including any online marketplaces such as iOffer and DHgate, social media platforms, Facebook, YouTube, LinkedIn, Twitter, Internet search engines such as Google, Bing and Yahoo, web hosts for the Defendant Domain Names, and domain name registrars, shall within three (3) business days of receipt of this Order:
  - a. disable and cease providing services for any accounts through which Defendants engage in the sale of counterfeit and infringing goods using the EMOJI Trademarks, including any accounts associated with the Defendants listed in Schedule A;
  - b. disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the EMOJI Trademarks; and
  - c. take all steps necessary to prevent links to the Defendant Domain Names identified in Schedule A from displaying in search results. This includes, but is not limited to, removing links to the Defendant Domain Names from any search index.
- 5. Defendants and any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of Defendants' websites at the Defendant Domain Names or other websites operated by Defendants, including, without limitation, any online marketplace platforms such as iOffer and DHgate, advertisers, Facebook, Internet Service Providers ("ISP"), web hosts, back-end service providers, web

designers, sponsored search engine or ad-word providers, banks, merchant account providers, including DHgate, third party processors and other payment processing service providers, shippers, and domain name registrars (collectively, the "Third Party Providers") shall, within five (5) business days after receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:

- a. The identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information;
- b. The nature of Defendants' operations and all associated sales and financial information, including, without limitation, identifying information associated with the Online Marketplace Accounts, the Defendant Domain Names, and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplace Accounts and Defendant Domain Names;
- c. Defendants' websites and/or any Online Marketplace Accounts;
- d. The Defendant Domain Names or any domain name registered by Defendants; and
- e. Any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation,


DHgate, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

6. Defendants and any persons in active concert or participation with them who have actual notice of this Order shall be temporarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
7. DHgate shall, within three (3) business days of receipt of this Order, for any Defendant or any of Defendants' Online Marketplace Accounts or websites:
  - a. Locate all accounts and funds connected to Defendants, Defendants' Online Marketplace Accounts or Defendants' websites, including, but not limited to, any DHgate accounts connected to the information listed in Schedule A hereto; and
  - b. Restrain and enjoin any such accounts or funds that are China or Hong Kong-based from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
8. Plaintiff may provide notice of these proceedings to Defendants, including notice of any future hearings and service of process pursuant to Fed.R.Civ.P. 4(f)(3), by electronically publishing a link to the Complaint, this Order and other relevant documents on a website to which the Defendant Domain Names are transferred to Plaintiff's control will redirect, or by sending an e-mail to the e-mail addresses identified in Schedule A hereto; and any e-mail addresses provided for Defendants by third parties accompanied by a link to the website where the above-identified documents are located. The Clerk of Court is directed to issue a single original summons in the name of "SHIHAO31 and all other Defendants identified in Schedule A to the Complaint" that shall apply to all Defendants. The combination of providing notice via electronic publication or e-mail, along with any

notice that Defendants receive from domain name registrars and payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their objections.

9. Plaintiff's Schedule A to the Complaint and the TRO is unsealed.
10. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order on two days' notice to Plaintiff or on shorter notice as set by this Court.
11. Plaintiff shall post a bond with the Court within one week of entry of this Order.

Dated: October 20, 2020

  
\_\_\_\_\_  
U.S. District Court Judge



**SCHEDULE A**

<b>No.</b>	<b>Defendant Name / Alias</b>
1	Shihao31
2	Shihao38
3	sand_profit
4	sehrgr
5	Senior_seller2
6	shanguofeng
7	shero_guo
8	Shihao1
9	Shihao14
10	Shihao25
11	Shihao26
12	Shihao28
13	Shihao30
14	Shihao32
15	Shihao36
16	Shihao37
17	Shihao39
18	shihao40
19	Shihao41
20	Shihao42
21	shihao43
22	Shilingxia
23	Shoebagfashion
24	shoushanjewelry
25	shuangyin004
26	Shupin2
27	shuping1
28	sidanshop
29	silver_store
30	silver-city
31	siyuexiaocha
32	slickgate
33	smalody
34	smie
35	starhui
36	steel_love_you
37	store_6
38	stuartlittle

39	Supluxury
40	susieshop2
41	suzoro
42	szxhshirley
43	tafree
44	tanqia
45	tellgaga_jewelry
46	tianjima
47	tiantian0808
48	tjtj2
49	top Rated China
50	top Rated Factory
51	top_seller2
52	top_toy
53	topgrillz
54	trendywill
55	uhotstore
56	unclouded01
57	unikjewelry
58	sd_toys
59	shelly_store
60	shenzhen2020
61	sherrie_lan
62	skybag
63	smile8z2
64	sport2017
65	sportsales
66	Sportsgame
67	st2017
68	Starone
69	stem
70	strading
71	sunfan111
72	suntal
73	superfeel
74	supersaler666
75	Tescosupermarket
76	thecute
77	tina310
78	Topfirst
79	Topprettypmall

80	topstore1126
81	totwo6
82	toy_goods
83	toys_gifts68
84	toysclub
85	shenzhen1
86	shenzhen11
87	superbestway
88	Toygiftmarket
89	toysstore_
90	Sophine09
91	sukatiger
92	sanjiang_items
93	sanjiang_store
94	settledown
95	shinelily
96	shunhuico
97	sophine12
98	spinbaby
99	Stay_home
100	stayrich
101	Summerbeddings
102	summerfunny
103	sunnie2015
104	sunshine_boy
105	sunshine633
106	tanzhilian
107	tina328
108	togedi
109	Toys_market
110	toys2000
111	Unicorns_home
112	sea-blooms
113	shootingbrake
114	shuaijinjin_china
115	Shuhuangzhen
116	simonry_jewelry
117	sixin_toy
118	smilexo
119	songx
120	s-teck

121	stephen_lee
122	sunny1112
123	suozhi1994
124	Suozhi1996
125	super02
126	sz_frozen
127	szcarsalon
128	tabshift
129	the_one
130	tina311
131	tina319
132	tina329
133	tinalt
134	top_pop
135	tracy0207
136	uline
137	selfport
138	shenyan02
139	shoesinbox
140	shoubag
141	showzone
142	shuiyong
143	singgirl
144	snappya
145	snowmen
146	starlife
147	stunning88
148	sunmart5
149	sunnysleepvip2
150	super05
151	Swiscafe
152	teaberry
153	thebrightlife
154	tina320
155	tomyang2009
156	tradingmk
157	trendone
158	tubi10
159	twopills
160	unicorns_no1
161	Runbaby

162	runfast
163	snailhome
164	Sport_xgj
165	store2014
166	sunglass1688
167	suozhi1992
168	superrain
169	Tankee
170	tasehook
171	tenworld
172	timelesszeng2
173	sara_yang
174	shanqingpeng
175	silencel
176	sophine11
177	superhome
178	Superiorwholesale
179	tanggo
180	tengdingbaby
181	totwo1
182	totwo9
183	sabonhome
184	santia
185	sasa431399
186	shoe
187	sjnp05
188	Stylish2019
189	summer_2017
190	sunlife2016
191	sweetfamily
192	ukcostco
193	sanjiang_cargo
194	singforlife
195	sohixu
196	sunninghu
197	super004
198	sweety520house
199	toplogo
200	toywholesale_store
201	ture_beauty
202	smartcostume

203	smartcostumes
204	Sportswear66
205	starwarss
206	suiyuan99
207	synthetic
208	Trajescosplay
209	scarves_home
210	slimskirt
211	suozhi1993
212	topgarden
213	toyyz
214	sellercp
215	Shenzhenxiuxue
216	sunmart1
217	supper007
218	sweethomes
219	Serlima
220	softness
221	starch
222	tanguimei
223	tiankonghalei
224	smoking0217
225	smoking168
226	smokingbuy
227	Smokingpipe0217
228	shop4fun
229	shoptrend
230	siweexautoparts
231	superdeal_lily
232	susanwang4043
233	Tongtrade
234	summerlover
235	supersticker
236	tooyaa
237	Top_health
238	toto4
239	sunnysleepvip5
240	sunnysleepvip6
241	run_man
242	runkid
243	sandy2009

244	seals168
245	sfgmrubh66986
246	Sherry900514
247	Smart_kids
248	Sohucom
249	sport_no1
250	sportbooth
251	sun1203
252	sunnyman520
253	supertoyou
254	Supmeme
255	supreme_baby
256	szxinyi
257	Tb90551520
258	tengtrade
259	tianganghome
260	tophat10
261	Toysstore_1
262	tradestreet

No	Defendants Online Marketplace
1	<a href="https://www.dhgate.com/store/21434043">https://www.dhgate.com/store/21434043</a>
2	<a href="https://www.dhgate.com/store/21433844">https://www.dhgate.com/store/21433844</a>
3	<a href="https://www.dhgate.com/store/21332555">https://www.dhgate.com/store/21332555</a>
4	<a href="https://www.dhgate.com/wholesale/products/ff8080816893847b0168dbdf944230e5.html">https://www.dhgate.com/wholesale/products/ff8080816893847b0168dbdf944230e5.html</a>
5	<a href="https://www.dhgate.com/wholesale/products/ff8080817076c4380170f390fe356600.html">https://www.dhgate.com/wholesale/products/ff8080817076c4380170f390fe356600.html</a>
6	<a href="https://www.dhgate.com/store/21225691">https://www.dhgate.com/store/21225691</a>
7	<a href="https://www.dhgate.com/store/20517141">https://www.dhgate.com/store/20517141</a>
8	<a href="https://www.dhgate.com/store/21433413">https://www.dhgate.com/store/21433413</a>
9	<a href="https://www.dhgate.com/store/21433285">https://www.dhgate.com/store/21433285</a>
10	<a href="https://www.dhgate.com/store/21433737">https://www.dhgate.com/store/21433737</a>
11	<a href="https://www.dhgate.com/store/21434035">https://www.dhgate.com/store/21434035</a>
12	<a href="https://www.dhgate.com/store/21434041">https://www.dhgate.com/store/21434041</a>
13	<a href="https://www.dhgate.com/store/21433743">https://www.dhgate.com/store/21433743</a>
14	<a href="https://www.dhgate.com/store/21433747">https://www.dhgate.com/store/21433747</a>
15	<a href="https://www.dhgate.com/store/21433839">https://www.dhgate.com/store/21433839</a>
16	<a href="https://www.dhgate.com/store/21434134">https://www.dhgate.com/store/21434134</a>

17	<a href="https://www.dhgate.com/store/21433847">https://www.dhgate.com/store/21433847</a>
18	<a href="https://www.dhgate.com/store/21434138">https://www.dhgate.com/store/21434138</a>
19	<a href="https://www.dhgate.com/store/21433854">https://www.dhgate.com/store/21433854</a>
20	<a href="https://www.dhgate.com/store/21434145">https://www.dhgate.com/store/21434145</a>
21	<a href="https://www.dhgate.com/store/21433856">https://www.dhgate.com/store/21433856</a>
22	<a href="https://www.dhgate.com/store/20654730">https://www.dhgate.com/store/20654730</a>
23	<a href="https://www.dhgate.com/store/21211997">https://www.dhgate.com/store/21211997</a>
24	<a href="https://www.dhgate.com/store/20721104">https://www.dhgate.com/store/20721104</a>
25	<a href="https://www.dhgate.com/store/21060493">https://www.dhgate.com/store/21060493</a>
26	<a href="https://www.dhgate.com/store/21538483">https://www.dhgate.com/store/21538483</a>
27	<a href="https://www.dhgate.com/wholesale/products/ff80808172a81ea80172bc04036e5d84.html">https://www.dhgate.com/wholesale/products/ff80808172a81ea80172bc04036e5d84.html</a>
28	<a href="https://www.dhgate.com/store/20954459">https://www.dhgate.com/store/20954459</a>
29	<a href="https://www.dhgate.com/store/19761963">https://www.dhgate.com/store/19761963</a>
30	<a href="https://www.dhgate.com/store/14177721">https://www.dhgate.com/store/14177721</a>
31	<a href="https://www.dhgate.com/store/20034813">https://www.dhgate.com/store/20034813</a>
32	<a href="https://www.dhgate.com/store/14333345">https://www.dhgate.com/store/14333345</a>
33	<a href="https://www.dhgate.com/store/20692713">https://www.dhgate.com/store/20692713</a>
34	<a href="https://www.dhgate.com/store/20146719">https://www.dhgate.com/store/20146719</a>
35	<a href="https://www.dhgate.com/store/20305030">https://www.dhgate.com/store/20305030</a>
36	<a href="https://www.dhgate.com/store/20983145">https://www.dhgate.com/store/20983145</a>
37	<a href="https://www.dhgate.com/wholesale/products/ff80808172dc86ec0172f47fa75027a6.html">https://www.dhgate.com/wholesale/products/ff80808172dc86ec0172f47fa75027a6.html</a>
38	<a href="https://www.dhgate.com/store/21509707">https://www.dhgate.com/store/21509707</a>
39	<a href="https://www.dhgate.com/store/21364245">https://www.dhgate.com/store/21364245</a>
40	<a href="https://www.dhgate.com/store/20283964">https://www.dhgate.com/store/20283964</a>
41	<a href="https://www.dhgate.com/store/20672227">https://www.dhgate.com/store/20672227</a>
42	<a href="https://www.dhgate.com/store/20503320">https://www.dhgate.com/store/20503320</a>
43	<a href="https://www.dhgate.com/store/21191247">https://www.dhgate.com/store/21191247</a>
44	<a href="https://www.dhgate.com/store/20331365">https://www.dhgate.com/store/20331365</a>
45	<a href="https://www.dhgate.com/wholesale/products/ff80808165c7e4c60165e7c70db06f32.html">https://www.dhgate.com/wholesale/products/ff80808165c7e4c60165e7c70db06f32.html</a>
46	<a href="https://www.dhgate.com/store/21100045">https://www.dhgate.com/store/21100045</a>
47	<a href="https://www.dhgate.com/wholesale/products/ff8080817076c4400170ecf929434ce3.html">https://www.dhgate.com/wholesale/products/ff8080817076c4400170ecf929434ce3.html</a>
48	<a href="https://www.dhgate.com/store/21236159">https://www.dhgate.com/store/21236159</a>
49	<a href="https://www.dhgate.com/store/19989665">https://www.dhgate.com/store/19989665</a>
50	<a href="https://www.dhgate.com/store/20748375">https://www.dhgate.com/store/20748375</a>
51	<a href="https://www.dhgate.com/store/21456806">https://www.dhgate.com/store/21456806</a>
52	<a href="https://www.dhgate.com/store/20329487">https://www.dhgate.com/store/20329487</a>
53	<a href="https://www.dhgate.com/store/21041302">https://www.dhgate.com/store/21041302</a>
54	<a href="https://www.dhgate.com/store/21245903">https://www.dhgate.com/store/21245903</a>



55	<a href="https://www.dhgate.com/store/21200838">https://www.dhgate.com/store/21200838</a>
56	<a href="https://www.dhgate.com/store/19970130">https://www.dhgate.com/store/19970130</a>
57	<a href="https://www.dhgate.com/store/20772984">https://www.dhgate.com/store/20772984</a>
58	<a href="https://www.dhgate.com/store/21303902">https://www.dhgate.com/store/21303902</a>
59	<a href="https://www.dhgate.com/store/20804602">https://www.dhgate.com/store/20804602</a>
60	<a href="https://www.dhgate.com/store/20434054">https://www.dhgate.com/store/20434054</a>
61	<a href="https://www.dhgate.com/store/21243424">https://www.dhgate.com/store/21243424</a>
62	<a href="https://www.dhgate.com/store/14095956">https://www.dhgate.com/store/14095956</a>
63	<a href="https://www.dhgate.com/store/20193641">https://www.dhgate.com/store/20193641</a>
64	<a href="https://www.dhgate.com/store/20653323">https://www.dhgate.com/store/20653323</a>
65	<a href="https://www.dhgate.com/store/14023344">https://www.dhgate.com/store/14023344</a>
66	<a href="https://www.dhgate.com/store/20773262">https://www.dhgate.com/store/20773262</a>
67	<a href="https://www.dhgate.com/store/20752523">https://www.dhgate.com/store/20752523</a>
68	<a href="https://www.dhgate.com/store/20461561">https://www.dhgate.com/store/20461561</a>
69	<a href="https://www.dhgate.com/store/20625315">https://www.dhgate.com/store/20625315</a>
70	<a href="https://www.dhgate.com/store/21016903">https://www.dhgate.com/store/21016903</a>
71	<a href="https://www.dhgate.com/store/21124160">https://www.dhgate.com/store/21124160</a>
72	<a href="https://www.dhgate.com/store/17959498">https://www.dhgate.com/store/17959498</a>
73	<a href="https://www.dhgate.com/store/21159190">https://www.dhgate.com/store/21159190</a>
74	<a href="https://www.dhgate.com/store/20999896">https://www.dhgate.com/store/20999896</a>
75	<a href="https://www.dhgate.com/store/20143235">https://www.dhgate.com/store/20143235</a>
76	<a href="https://www.dhgate.com/store/21122633">https://www.dhgate.com/store/21122633</a>
77	<a href="https://www.dhgate.com/store/20320967">https://www.dhgate.com/store/20320967</a>
78	<a href="https://www.dhgate.com/store/19807209">https://www.dhgate.com/store/19807209</a>
79	<a href="https://www.dhgate.com/store/19925600">https://www.dhgate.com/store/19925600</a>
80	<a href="https://www.dhgate.com/store/20672830">https://www.dhgate.com/store/20672830</a>
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